

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS LICENSING AND DEVELOPMENT, <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> GOOGLE LLC, <p style="text-align: center;">Defendant.</p>	Case No. 6:20-cv-00571-ADA Case No. 6:20-cv-00572-ADA Case No. 6:20-cv-00573-ADA Case No. 6:20-cv-00574-ADA Case No. 6:20-cv-00575-ADA Case No. 6:20-cv-00576-ADA Case No. 6:20-cv-00577-ADA Case No. 6:20-cv-00578-ADA Case No. 6:20-cv-00579-ADA Case No. 6:20-cv-00580-ADA Case No. 6:20-cv-00581-ADA Case No. 6:20-cv-00582-ADA Case No. 6:20-cv-00583-ADA Case No. 6:20-cv-00584-ADA Case No. 6:20-cv-00585-ADA <p style="text-align: center;">JURY TRIAL DEMANDED</p>
---	---

JOINT CASE READINESS STATUS REPORT

TO THE HONORABLE COURT:

Plaintiff WSOU Investments, LLC and Defendant Google LLC, hereby provide the following status report in advance of the initial Case Management Conference (CMC).

FILING AND EXTENSIONS

Plaintiff WSOU filed a complaint in each of the above-numbered cases on June 29, 2020. There has been one extension for a total of 45 days in all cases except in *WSOU Investments LLC v. Google LLC*, No. 6:20-cv-00571; in that case, there were two extensions for a total of 45 days; a first extension for 45 days, and a second extension after WSOU filed a first amended complaint on August 5, 2020, covering the same period and ensuring that Google's Rule 12 responses all fell on the same day.

RESPONSES TO THE COMPLAINTS

Defendant filed an answer in the following cases on September 11, 2020: -00571, -00572, -00573, -00574, -00576, -00578, -00579, -00581, -00582, -00583, and -00584.

PENDING MOTIONS

Defendant filed a motion to dismiss pursuant to Rule 12(b)(6) in the following cases on September 11, 2020: -00575, -00577, -00580, and -00585. There are no other pending motions.

RELATED CASES IN THIS JUDICIAL DISTRICT

The above-numbered cases were all filed by Plaintiff against Defendant in this District. There are no known related cases.

IPR, CBM, AND OTHER PGR FILINGS

There are no known IPR, CBM, or other PGR filings with respect to the patents asserted in the above-numbered cases.

NUMBER OF ASSERTED PATENTS AND CLAIMS

Based on the current understanding of Defendant's products, Plaintiff intends to assert in the infringement contentions the following number of claims:

Case	Number of Patents	Number of Claims
-00571	1	9
-00572	1	14
-00573	1	5
-00574	1	21
-00575	1	12
-00576	1	7
-00577	1	20
-00578	1	4

-00579	1	26
-00580	1	41
-00581	1	12
-00582	1	4
-00583	1	5
-00584	1	5
-00585	1	6

APPOINTMENT OF TECHNICAL ADVISOR

The parties are discussing whether appointment of a technical adviser would be beneficial and will so advise the Court in the coming weeks.

MEET AND CONFER STATUS

The parties raise the following pre-*Markman* issues:

Conduct of Markman Hearing – the parties understand that the Court has scheduled these cases for *Markman* on March 25-26, 2021. The parties are meeting and conferring and will make a proposal to the Court for orderly presentation of the claim construction issues presented in the above-numbered cases over the two days allocated for hearing.

Protective Order – the parties anticipate submitting a proposed form of protective/confidentiality order, or their limited disputes regarding such an order, in the coming days.

Date: October 2, 2020

Respectfully submitted,

By: /s/ James L. Etheridge
James L. Etheridge
Texas Bar No. 24059147
Ryan S. Loveless

Texas Bar No. 24036997
Brett A. Mangrum
Texas Bar No. 24065671
Travis L. Richins
Texas Bar No. 24061296
Jeff Huang
Etheridge Law Group, PLLC
2600 E. Southlake Blvd., Suite 120 / 324
Southlake, TX 76092
Tel.: (817) 470-7249
Fax: (817) 887-5950
Jim@EtheridgeLaw.com
Ryan@EtheridgeLaw.com
Brett@EtheridgeLaw.com
Travis@EtheridgeLaw.com
Jeff@EtheridgeLaw.com

Mark D. Siegmund
State Bar No. 24117055
mark@waltfairpllc.com
Law Firm of Walt, Fair PLLC.
1508 North Valley Mills Drive
Waco, Texas 76710
Telephone: (254) 772-6400
Facsimile: (254) 772-6432

Counsel for Plaintiff WSOU Investments, LLC

/s/ Michael E. Jones
Michael E. Jones (Texas Bar No. 10929400)
Patrick C. Clutter (Texas Bar No. 24036374)
Potter Minton, P.C.
110 North College, Suite 500
Tyler, Texas, 75702
+1 (903) 597-8311
+1 (903) 593-0846 facsimile
mikejones@potterminton.com
patrickclutter@potterminton.com

Tharan Gregory Lanier (*pro hac vice*)
Jones Day
1755 Embarcadero Road
Palo Alto, California, 94303
+1 (650) 739-3939
+1 (650) 739-3900 facsimile
tglanier@jonesday.com

Matthew S. Warren (*pro hac vice*)

Jen Kash (*pro hac vice*)

Warren Lex LLP

2261 Market Street, No. 606

San Francisco, California, 94114

+1 (415) 895-2940

+1 (415) 895-2964 facsimile

20-571@cases.warrenlex.com

20-580@cases.warrenlex.com

20-583@cases.warrenlex.com

20-585@cases.warrenlex.com

Attorneys for Defendant Google LLC